

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CLARA LUCILLE BOWMAN	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CLARA LUCILLE BOWMAN	:	
Respondent	:	CASE NO. 5-23-bk-00907

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 12th day of June, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. The Trustee avers that debtor's plan is not feasible based upon the following:
 - a. The plan is underfunded relative to claims to be paid.
The plan estimates \$40,200.00 in mortgage arrearages and an arrearage claim has not yet been filed.
2. Trustee avers that debtor's plan cannot be administered due to the lack of the following:
 - a. Need credit report.

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 23rd day of June, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Charles Laputka, Esquire
1344 West Hamilton Street
Allentown, PA 18102

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee